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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JOHN LEDBETTER, ROBERT
AARON, and ANTONIO SEGOVIA,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

vs.

CJ LOGISTICS AMERICA, LLC, an
Illinois Limited Liability Company;
and DOES 1 through 100, inclusive,

Defendants.

Case No. 5:22-cv-00967-KK-SHK

**JOINT NOTICE OF SETTLEMENT,
STIPULATION TO VACATE TRIAL
AND TRIAL-RELATED DATES AND
DEADLINES, AND TO SCHEDULE
FURTHER STATUS CONFERENCE**

Action Filed: April 7, 2022
Removal Date: June 10, 2022
Trial Date: October 1, 2024

**JOINT NOTICE OF SETTLEMENT, STIPULATION TO VACATE TRIAL AND
TRIAL-RELATED DATES AND DEADLINES, AND TO SCHEDULE FURTHER
STATUS CONFERENCE**

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1 TO THE HONORABLE COURT:

2 Plaintiffs John Ledbetter, Robert Aaron, and Antonio Segovia (collectively,
3 “Plaintiffs”) and Defendant CJ Logistics America, LLC (“Defendant”) (collectively with
4 Plaintiffs, the “Parties”), by and through their respective counsel of record, submit the
5 following Joint Notice of Settlement, Stipulation to Vacate Trial and Related Dates and
6 Deadlines, and to Schedule Further Status Conference:

7 WHEREAS, on October 25, 2023, the Honorable Judge Jesus G. Bernal issued an
8 Order Granting Joint Stipulation to Continue Trial and Trial-Related Dates and Deadlines
9 [Dkt. No. 30], which set trial in this matter for October 1, 2024, at 9:00 a.m.;

10 WHEREAS, on August 23, 2023, the Parties attended a private mediation with
11 well-respected wage and hour mediator Jeffrey Ross, Esq. Although the Parties adjourned
12 mediation prior to reaching a settlement, through ongoing settlement negotiations with
13 the mediator’s assistance, the Parties reached a tentative agreement in January 2024 for a
14 settlement to resolve this matter in its entirety on a class-wide basis;

15 WHEREAS, the Parties are in the process of memorializing their settlement in a
16 long-form settlement agreement, which they anticipate to have finalized within the next
17 30-days. The Parties are also meeting and conferring over proper procedures for seeking
18 approval of the proposed class-wide settlement; and

19 WHEREAS, in light of the Parties’ settlement and in the interest of judicial
20 economy, the Parties wish to vacate the October 1, 2024 trial date and all pending trial-
21 and law and motion-related dates and deadlines, and schedule a Further Status Conference
22 RE: Settlement in approximately 60 days.

23 THEREFORE, the Parties, by and through their counsel of record, HEREBY
24 STIPULATE AND AGREE, and respectfully jointly request, that the Court:

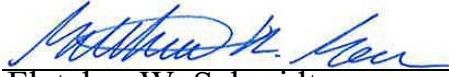
- 25 1. Vacate the Parties’ October 1, 2024 trial date and all trial-related dates and
26 deadlines in light of the Parties’ resolution of all claims at issue in this litigation;

2. Vacate Plaintiffs' April 17, 2024 deadline to file a Motion for Class Certification and all other pending law and motion-related dates and deadlines; and
3. Set a Further Status Conference RE: Settlement in approximately 60 days, or as soon thereafter as is convenient for the Court.

IT IS SO STIPULATED.

Dated: March 29, 2024

HAINES LAW GROUP, APC

By: 
Fletcher W. Schmidt
Matthew K. Moen
Attorneys for Plaintiffs
JOHN LEDBETTER,
ROBERT AARON, and
ANTONIO SEGOVIA

Dated: March 29, 2024

O'MELVENY & MYERS LLP


By: /s/ Adam J. Karr
Adam J. Karr
Allan W. Gustin
Attorneys for Defendants
CJ LOGISTICS AMERICA, LLC.

Attestation of Signatures

I, Matthew K. Moen, hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: March 29, 2024

HAINES LAW GROUP, APC

By: 
Matthew K. Moen
Attorneys for Plaintiff